



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

NS:TH  
F. #2017R01840

*271 Cadman Plaza East  
Brooklyn, New York 11201*

October 23, 2019

By ECF

The Honorable Nicholas G. Garaufis  
United States District Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Keith Raniere  
Criminal Docket No. 18-204 (S-2) (NGG)

Dear Judge Garaufis:

The government respectfully submits this letter to supplement its response in relation to the conflict raised at the September 13, 2019 conference before the Court. As the Court is aware, Ms. Geragos submitted an application to the United States Attorney's Office for the Eastern District of New York (the "Office") on August 12, 2019, well after the trial of Keith Raniere concluded in the above-captioned case.

Ms. Geragos's application to the Office is no longer pending and it does not appear that Ms. Geragos is seeking employment with another United States Attorney's Office at this time. Under these circumstances, the likelihood that Ms. Geragos's professional judgment on Raniere's behalf would be affected by her personal interest in securing employment with this Office or another U.S. Attorney's Office is remote. Nevertheless, the government agrees with the conclusion in Mr. Moskowitz's October 17, 2019 letter to the Court and respectfully submits that, in an abundance of caution, the Court should conduct a Curcio inquiry in order to advise Raniere that any continued interest on the

part of Ms. Geragos in seeking future employment as an Assistant United States Attorney may pose a potential conflict and to instruct him regarding his right to conflict-free representation. See United States v. Curcio, 680 F.2d 881, 888-90 (2d Cir. 1982); see, e.g., United States v. Buissereth, 638 F.3d 114, 117 (2d Cir. 2011) (finding that defendant had made a knowing and intelligent waiver when fully informed of the potential conflict of interest arising out of his counsel's application to the United States Attorney's Office); United States v. Jenkins, 943 F.2d 167 (2d Cir. 1991) (same).

Respectfully submitted,

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Teny Geragos, Esq. (counsel for Raniere)  
Avraham C. Moskowitz, Esq. (Curcio counsel for Raniere) (by email)